

High Density Living Supplementary Planning Document

Consultation and Engagement Report

25/07/2020



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Introduction

Background and Context

- 1.1 The Strategic Planning service has prepared a Supplementary Planning Document (SPD) that provides guidance on the design of high density residential and mixed use development. The SPD supports the new Local Plan to 2031, in particular Policy S.DH1- Delivering high quality design and Policy D.DH7 - Density. The project helps to deliver the Mayor's manifesto pledges to improve the quality and fairness of housing and make development work for local people. This responds to the National Planning Policy Framework (NPPF) and new London Plan, and will be prepared and adopted in accordance with the provisions in the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 The project responds to important recent changes in national and regional policy. Firstly, the significant emphasis that the new London Plan places on optimising housing density to deliver sufficient new homes and that, unlike its predecessor, the new London Plan does not set out target density ranges, and instead leaves upper density levels open, allowing boroughs to determine the appropriate development in the context of their existing character and densities. Secondly, the new NPPF and new London Plan place great emphasis on design quality to achieve high quality buildings and places. The NPPF encourages plans and supplementary guidance to provide maximum clarity about design expectations at an early stage through visual tools such as design guidelines. The High Density Living guidance seeks to provide a clear design vision and set expectations for future development in the borough.
- 1.3 The project's main objective is to ensure that the design of new high density development contributes toward a high-quality of life. It will also enable stakeholders, such as residents, Members, developers and officers, to better understand the role of design in high density residential and mixed-use development.

Role of the Consultation and Engagement Report

1.4 The SPD is subject to statutory preparation procedures under Regulations 16-19 of the Town and Country Planning (Local Development) (England) Regulations 2012. This Consultation and Engagement Report has been prepared to:

- provide an engagement framework that describes the main consultation methods that have been used;
- summaries the key issues raised by the community and stakeholders and;
- set out the Council's response to representations received, and how they have help shape the SPD.

Consultation and Engagement

Approach

1.5 The approach to consultation has been developed to be in conformity with the Council’s Statement of Community Involvement (SCI) (2019), the Corporate Handbook and in collaboration with the Communications Team. The overarching aim for consultation is to provide an opportunity for involvement from a wide range of local community groups and individuals.

How we involved the community and stakeholders

1.6 There are several distinct stages to consultation activities to progress SPDs. The table below sets out the stages in preparing the SPD and identifies where the community and key stakeholders had the opportunity to get involved.

Table 1 – High Density Living SPD Consultation Stages

Stage		Purpose of communication	How the stakeholders have their say
Stage 1 – Project scoping	April- July 2018	Agree the project vision, scope and methodology.	Workshops and one to one meetings
Stage 2 – Evidence Gathering	August 2018- January 2019 Additional survey June 2019	Gather evidence to understand how density impacts on quality of life and to support future recommendations.	Participating in surveys and interviews.
Stage 3 – Options testing	January- July 2019	Seek internal feedback on options for guidance and recommendations and decide on a way forward.	Workshops, co-design sessions and one to one meetings
Stage 4 - Statutory Consultation	March 9 th to May 15 th 2020	Publicise the proposed recommendations and guidance and seek feedback on them.	By writing to us, completing a survey and/or attending a consultation

			event.
Stage 5 -Adopting the SPD	December 2020	Disseminate the findings of the public consultation and decide on adoption of the guidance and recommendations.	N/A

1.7 Throughout the SPD preparation process, consultation techniques and activities were carried out to ensure an effective and efficient engagement. Some of these include:

Meeting with Elected Members

Regular engagement with Lead Member and wider members to ascertain community priorities and aspirations, to ensure community issues are fed into the SPD.

Public Exhibitions and Drop-in Sessions

Events within areas experiencing increasing residential density or near selected case studies were held. This included exhibitions summarising the research process, short films, copies of the document to be consulted and opportunities to discuss with Council Officers. Three in total were planned although only one was eventually conducted due to the onset of COVID-19 restrictions.

Developers Forum

At the outset a steering group was established with key developers to introduce the project and shape the research process. The project was later presented at the Tower Hamlets Developer’s Forum giving the opportunity for discussion and feedback in addition to opportunities for further involvement away from the Forum.

Internal Working Group

Regular meetings with internal officers to inform and update on the progress of the document. This included members of the housing, waste and highways teams as well as strategic planning and policy.

External Stakeholder Workshops

Workshops were held with various stakeholders at relevant registered providers to gain feedback on objectives and design strategies to meet these. In addition, meetings were held with various experts in specific topics such as child friendly design and the circular economy to shape more detailed guidance.

On-line updates

Regularly update the Council's website and social media platforms such as Facebook, Twitter and LinkedIn, to inform people of the consultation process and progress of the document.

Advert and/or Article in local newspaper

Advert in the East End Life to inform people of consultation events.

Flyers in Idea Stores

Flyers placed in Idea Stores to inform residents, workers and visitors of consultation events and activities.

Email and Letters

Contacted those on the Local Plan Consultation database to inform them of the consultation and upcoming events.

Consultation Programme

Approach

1.8 The consultation activities were broken down into five stages. The sections below outline the role of each stage of the SPD development process as well as key stakeholder groups, methods and time frames for each.

Stage One – Project Scoping

1.9 The purpose of the communication at this stage of the project is to agree the project vision, scope and methodology. Selected stakeholders, with technical knowledge of high-density development, were invited to form a sounding board to comment on the vision scope, and methodology.

Table 2 – Stage 1 High Density Living SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Housing Associations, Developers, Architects, Academics and other local planning authorities.	Sounding board	Two meetings held as a result of large numbers to discuss the project vision, scope and methodology.	July 2018
Members	Briefing	Mayors planning meeting, emails to Lead Member and a Member's bulletin.	June to September 2018

Corporate and Directorate leadership	Briefing	Meetings with Corporate Director for Place, CLT and DLT	August 2018
Conservation and Design Review Panel (CADAP)	Briefing	Presentation of the vision, scope and methodology to gain further feedback.	October 2018

Stage Two – Evidence Gathering

- 1.10 The purpose of the communication at this stage of the project is to gather evidence to understand how density impacts on quality of life and to support future recommendations.
- 1.11 Nine high density case studies were selected across the borough and two surveys conducted with both residents living within the buildings and those living or working around the building. Follow up qualitative interviews were also conducted.
- 1.12 Workshops were held with a range of stakeholders linked to the development and management of high density residential buildings. This included developers, architects, residents associations, building managers and various Council services.

Table 3 – Stage 2 High Density Living SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Residents (across the nine case studies)	Survey and semi-structured interviews	Residents of selected case study schemes, and those in the neighbourhood. Door-to-door, postal and online survey with follow-up semi-structured interviews. Over 500 residents were surveyed and 40 interviewed.	August to October 2018

Council services	Workshops	Themed workshops to explore the links between the design of high-density homes and neighbourhoods. Teams included Housing, Public Health, Sustainability, Public Realm, Transport, Waste, Services and leisure and Development Management.	October 2018
External services	Workshop	Workshop to explore density issues in relation to the Police service.	November 2018
Housing associations	Briefing and engagement	Presented and discussed the project with the Tower Hamlets Housing Forums. Subgroups engaged with include Development, Housing Management, Public Realm and Anti social behaviour.	August to November 2018
Developers	Sounding board	Interviews to explore density issues in relation to the development process.	July 2018
Architects	Semi-structured interviews	Interviews to explore density issues in relation to the design process. Architects contacted were responsible for the case studies assessed and include Brady Mallalieu, Allies and Morrison, SOM and LDS.	November 2018 to February 2019
Residents groups and Members	Workshop	Workshop to explore density issues with representatives from the Tower hamlets neighbourhood forums and relevant Members.	November 2018
Building managers and care takers	Site visits	Site visits were conducted with building managers and/ or care takers in each of the nine case studies to explore management issues and implications in greater depth.	November to December 2018

Neighbourhood survey	Survey	Residents living around the 9 case studies. Over 500 residents were surveyed.	June 2019
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Stage Three – Options Testing

1.13 Following the research phase, communication sought feedback on findings and options for guidance and recommendations.

Table 4 – Stage 3 High Density Living SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Political, Directorate and Corporate Leadership	Briefing	Lead Member one to one and the Isle of Dogs Regeneration board, DLT and CLT.	September to November 2019
Residents	Co-design workshops	Workshop at case study Goodman’s Field as part of the GLA’s Social Integration Lab.	June 2019
Experts groups	Workshop / meetings	Workshops held with Academics, policy makers and relevant manufacturers. This includes child development experts, researchers on the circular economy and home working, waste academics and manufacturers and water academics and manufacturers.	June to September 2019.
Councils services	Workshops	Workshop to explore options for guidance and recommendations and their interrelationships with	June to November 2019

		council services. This includes the Waste team, Public Health, Housing, Strategy, Policy and Performance and Communications.	
Housing associations	Workshop and Tower Hamlets Housing Forum	Workshop to explore options for guidance and recommendations and their implications for the development and management of residential developments.	October 2019
Development Management and Strategic Planning officers	Workshops	Workshop to explore options for guidance and recommendations and their implications for the development management process.	November 2019
Internal sounding board	Comments/feedback		November and December 2019
CADAP	Presentation	Presentation of research findings and options for guidance.	September 2019
Architects	Meetings	Discussion of research findings and options for guidance.	November to December 2019
Developers	Developers Forum	Presentation of research findings and options for guidance.	October 2019

Stage Four – Statutory Consultation

1.14 The statutory consultation period for the draft High Density Living SPD was originally planned for six weeks from March 9th 2020 to April 20th 2020. This included drop in sessions and exhibitions in three locations experiencing or likely to experience an increase in high density residential developments.

- 1.15 However, due to restrictions as a result of COVID-19, only the first event at the Whitechapel Idea Store could be held. The later drop in sessions and exhibitions were cancelled.
- 1.16 As a result, all exhibition material including a short film was made available online and changes to the consultation widely publicised.
- 1.17 The duration of the consultation period was extended by an additional four weeks to May 15th 2020, increasing the time for residents and other stakeholders to complete the survey or provide written representations.

Table 5 – Stage 4 High Density Living SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Members and Local Development Framework (LDF) Database and individuals involved in developing the SPD.	Launch Event	Event at the Whitechapel gallery to launch the consultation and draw attention to the research project and SPD beyond the borough.	March 2020
The general public and LDF Database.	Media campaign	Publication on the website, East End Life, emails, letters, posters etc, informing of consultation events and activities.	March to May 2020
The general public.	Drop In Sessions	To outline the research process, introduce and discuss the aims and objectives of the SPD as well as design solutions. These were planned in locations across the borough in locations experiencing an increase in high	March to May 2020

		<p>density residential development.</p> <p>This included an exhibition summarising the research process, a short film and copies of the document to review.</p> <p>Three were planned for Whitechapel, Bow and Canary Wharf but only the Whitechapel session held due to COVID-19 restrictions.</p>	
The general public.	Public Exhibition and hard copies of the SPD	<p>Following the drop in sessions exhibition material was planned to be retained in key locations within the Idea Stores including information about how to engage.</p> <p>Exhibitions were cancelled as a result of COVID 19 restrictions.</p>	Cancelled
The general public and LDF Database.	Online Consultation Portal	Online material including exhibition content, videos, the draft SPD, supporting material and details of how to comment.	March to May 2020
The general public and LDF Database.	Online survey and contact details	Survey developed and hosted via the consultation portal to structure responses to the SPD. An email address was also provided for written representations.	March to May 2020

Stage Five – Adoption

1.18 Following a review of the representations received through the statutory consultation process, the SPD was amended. The preparation for adoption then includes a briefing to all members and corporate and directorate leadership teams on the outcome of the consultation and the recommendations for the way forward.

Table 6 – Stage 5 High Density Living SPD Consultation Details

Stakeholder groups	Methods	Description	Dates
Planning Officers	Workshops	Workshops with members of Development Management to discuss representations received and amendments to the SPD.	July 2020
Statutory Environmental Bodies	SEA Screening Determination	To confirm that the SPD does not require an SEA, in accordance with the requirements of regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004.	September 2020
Political, Corporate and Directorate Leadership	Briefing	Mayors Planning Meeting, Lead Member one to one, CLT and DLT to brief on the outcome of the consultation and recommendations for the way forward.	September to November 2020

Consultation and Engagement Feedback

Overview and Summary

- 1.19 This section of the Consultation and Engagement Plan summarises the feedback arising from the consultation on the SPD. This includes representations and comments submitted, and the Council’s response to these. The comments and representations received through the consultation process have been used to finalise the SPD.
- 1.20 The statutory consultation period for the draft High Density Living SPD ran from March 9th to May 15th 2020, this includes the extension of time as a result of COVID 19.
- 1.21 Over 50 people attended the consultation events held by the Council. 62 sets of representations were received from Members, local residents, statutory consultees, landowners and developers during the consultation period, 33 in the form of written representations and 29 responses from a survey hosted in the online consultation portal.
- 1.22 A summary of the key issues that were raised from written representations and the survey are detailed in the table below. This is broken down into a summary of general comments on the document and the themes it covers and then comments on specific design guidelines.

Table 7 – Consultation Feedback Summary

General Comments	
Key Issues	Council Response
Comments praised the ambition and scope of the document but questioned how it would be applied and how much weight it would carry.	The introduction has been amended to add more details as to how to use the document and how it will be applied.
Comments found the document too lengthy.	The document has been streamlined from 132 to 98 design guidelines.

<p>Some design guidelines were stated to be beyond the scope of planning, contradictory to existing policy or a repetition of existing policy and/or guidance.</p>	<p>Guidelines contradictory to existing policy have been deleted or amended.</p> <p>The document aims to be a holistic and comprehensive guide to creating high density residential environments that support good quality of life. To retain comprehensiveness, guidelines drawn from existing policy or guidance will make reference to their source. If guidelines are beyond the scope of planning but important for delivering high quality places they have been marked 'Further Consideration'.</p>
<p>Some representations questioned the impact of COVID-19 on the appropriateness of high density residential environments and/or whether design should change.</p>	<p>Implications of COVID-19 is not fully understood however, the pandemic has given even more weight to some of the elements identified in the design guidelines including access to outdoor space.</p>
<p>The document was not deemed to make sufficient reference to fire and the Grenfell tragedy.</p>	<p>The focus of the SPD is on layouts rather than materials and building regulations, however the document has been amended to better address fire. Where appropriate guidelines have been amended to ensure they do not impact fire risk.</p>
<p>Some comments raised the impacts of construction on noise, vibration and the quality of the public realm, particularly for the movement of disabled residents.</p>	<p>This is considered beyond the scope of the SPD.</p>
<p>The document was not deemed to adequately address car parking.</p>	<p>Car parking and highways implications are covered through Local Plan policies and discussions with highways officers.</p>
<p>Comments on Design Guidelines</p>	
<p>Key Issues</p>	<p>Council Response</p>
<p>Guidelines on open space were considered more onerous than existing policy and specific area requirements unjustified.</p>	<p>The guidelines have been amended to better follow Local Plan policy by removing specific area requirements and referring to generous public realm.</p>
<p>Some representations resisted guidelines that sought to ensure public realm was delivered in addition to communal amenity space and play space requirements and sought that communal amenity space was accessible for the wider area especially</p>	<p>Better reference has been made to existing policy that seeks to avoid double counting, in particular tall building policy that requires communal amenity space specifically for residents of that development.</p> <p>Guideline 2 has been amended to outline the objectives of the three spaces required</p>

<p>in instances of estate regeneration.</p>	<p>(public realm, communal amenity space, play space) and options for how this can be achieved.</p>
<p>Survey responses from residents found access to open space to be insufficient and as a result did not feel homes were suitable for families. They requested development deliver more open space.</p>	<p>The SPD cannot request space above requirements outlined in the London and Local Plan. The introduction has been amended to better outline the role of the document.</p> <p>Research found families were living at high density and the document seeks to ensure these environments are suitable. This includes the design of public realm, location and design of play space and home layouts.</p>
<p>Some representations found servicing and delivery requirements, drop off space and recommendations for public realm features to be onerous.</p>	<p>Servicing and delivery and drop off guidelines were developed alongside the Council's Highways team and highways policies of the Local Plan and are deemed best practice for high density residential environments.</p> <p>The guidelines for features in the public realm provide options for achieving high quality spaces, it is not expected all will be delivered.</p>
<p>Some comments resisted guidelines including nurseries or public uses such as shops or cafes saying this should follow market demands.</p>	<p>The guideline has been amended to add flexibility according to market demands.</p>
<p>Representations questioned why traditional waste systems were not appropriate.</p>	<p>The response and guidelines refer back to the Local Plan which encourages other forms of waste collection.</p> <p>The document has also been amended in light of the emerging Waste SPD.</p>
<p>Comments found guidelines on outdoor environment to be repetitive.</p>	<p>The guidelines have been streamlined, outdoor environmental guidelines are now addressed in the 'around the building' section.</p>
<p>Representations felt there was insufficient reference to climate change, biodiversity and urban greening. Survey respondents in particular wanted more trees and green space.</p>	<p>Environmental guidelines have been reformulated to provide better clarity on requirements for biodiversity and green space.</p> <p>Numerous guidelines were developed in order to adapt and mitigate to climate</p>

	change however explicit reference has been made where appropriate.
Some representations resisted requirements that play be provided outdoor saying this was overly onerous.	From discussions with child development experts, outdoor play was deemed essential. Development is already expected to meet Play England's 10 design principles and it is not felt that this can be met indoors.
Survey responses from residents requested shared facilities stating lack of shared space resulted in segregation.	The guidelines encourage all outdoor amenity space to be shared to foster social integration.
There was strong difference in opinion over roof top play spaces. Some representations sought for these to be resisted due to anti-social behaviour and safety concerns. Other representations stated discouragement of roof top play was overly onerous and not supported by existing policy.	The document has been restructured and guidelines amended to encourage typologies where play can be delivered at the lower levels (podiums or courtyards). However, it also includes guidelines for measures play spaces must meet if provided elsewhere. This seeks to improve safety and increase the ease of management.
Some representations stated similar entrance lobbies and a shared concierge was unnecessary and would have service charge implications.	Guidelines on entrances and building management have been amended to provide various options that meet desired outcomes but with less impacts on service charge.
Survey responses found guidelines on cycling did not address the reasons why uptake was low; safety, distance and lack of good routes. Other representations felt specific cycle parking requirements to be arbitrary and not supported by existing policy.	The SPD is about the design of residential buildings so cycle routes and road layouts are beyond its scope. The document aims to make cycle storage safe and convenient. The guidelines on cycle storage have been amended to provide options.
Survey responses stated high density residential buildings were inappropriate living environments due to small sizes, lack of storage and high cost. Representations from developers stated it was unacceptable to ask for more than the nationally prescribed space standards or building regulations and that guidelines would impact development viability.	The SPD cannot request more than the nationally prescribed space standards. The guidelines on home layouts have been amended to outline how minimum space standards can be met in a way that maximises adaptability and flexibility to create homes where people can live long term.

1.23 In addition to the option to provide written feedback, the online survey was broken down into five sections covering the themes of the High Density Living SPD:

- Children and Young People
- Mixed and Balanced Communities
- Everyday Life
- Buildings and Systems
- Healthy Neighbourhoods

1.24 Survey respondents were asked to consider the main objectives for each of the five topics and whether the design guidelines would ensure that new high density residential development meet these objectives. This took the form of a quantitative survey in addition to written comments.

1.25 The table below outlines the results of the quantitative survey. The majority of survey respondents agreed the design guidelines would meet the desired objectives for each topic, Children and Young People and Buildings as Systems being most successful.

Table 8 – Quantitative Online Survey Summary

Topic 1 – Children and Young People				
Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
2 (7%)	14 (48%)	5 (17%)	5 (17%)	3 (10%)
Topic 2 – Mixed and Balanced Communities				
Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
5 (17%)	8 (28%)	8 (28%)	5 (17%)	3 (10%)
Topic 3 – Everyday Life				
Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
5 (17%)	9 (31%)	7 (24%)	7 (24%)	1 (4%)
Topic 4 – Buildings as Systems				

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
5 (17%)	13 (45%)	4 (14%)	5 (17%)	2 (6%)
Topic 5 – Healthy Neighbourhoods				
Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
4 (14%)	10 (34%)	7 (24%)	4 (14%)	4 (14%)